

## REMARKS

The Abstract has been corrected as requested in paragraphs 1 and 2 of the Office Action. The drawings have not been corrected as the numeral 100 actually appears within the drawing in Figure 1b, so no correction is required to the drawing objection in paragraph 3 of the Office Action.

The Examiner notes many errors in the claims in the objections to the claims and indicates there are many more errors not specifically called out by the Examiner. This case has recently been assigned to new counsel and as a result all 18 claims have been reviewed in detail to remove redundancies, revise needless limitations addressed to pluralities where a single unit should also be covered. The reference to the wellhead is changed to a surrounding tubular an example of which could be a wellhead but there are other applications beyond wellheads and the specification contemplated serial insertions of tubular strings in a wellhead so that subsequent strings are inserted into previously inserted strings. For that reason the reference to wellhead was considered unduly restrictive. Careful attention was paid to proper reference to background structures as distinguished from the actual claimed elements of the invention. The dependent claim preambles were dramatically abridged to remove needless repetition. Finally, the independent claims were slightly reshuffled to put the non-rotation feature out of the preamble and into the claim body to emphasize the difference between the originally filed claims and the cited Wightman reference USP 4,712,621.

New claims are added to fully capture the invention disclosed in the specification. Claim 19 is a distillation of claim 1 to the elements that define the invention from the prior art and the other dependent claims add elements to eventually get back to the start point of claim 1.

The Examiner cites Wightman Column 8 Lines 60-65 but this statement is in a limited context. The operation of the Wightman tool requires turning to the right on at least two occasions after the cementing is concluded. In Column 6 starting at Line 51 it states that the drill pipe is rotated right 120 degrees to break shear pins 23 by rotating the barrel 13 relative to the housing 19. The barrel 13 is part of the mandrel assembly of the Wightman tool. After the seal is pressure tested the drill pipe is rotated another 120 degrees to the right and lowered, as indicated in Column 7 Line 39 to Column 8 Line 2. This procedure is key to release the tool.

Accordingly from the time cement is delivered, no further steps can be accomplished with Wightman without rotating to the right 120 degrees and the tool can't

be removed without a second 120 degree rotation to the right. On the other hand the tool in independent claims 1, 12 and 19 actuates the seal member or assembly without mandrel rotation. The disadvantages of requiring rotation in a subsea wellhead application where the wellhead can be thousands of feet below the waterline are discussed in the specification. The Wightman reference's requirement of rotation on two occasions and more particularly for seal actuation, presents those disadvantages that are overcome in the present invention as claimed in all three independent claims by avoiding mandrel rotation.

Allowance of all the claims is requested.

Respectfully submitted,



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